

**REMARKS**

This Application has been carefully reviewed in light of the Final Office Action mailed January 13, 2004. Applicants appreciate the Examiner's consideration of the Application. Claims 1, 9, 17, 25, and 33 have been amended to clarify, more particularly point out, and more distinctly claim inventive concepts previously present in these claims. These amendments are not considered necessary for patentability. Applicants respectfully submit that no new matter has been added by the amendments to the claims. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

**Section 102 Rejection**

The Examiner rejects Claims 1, 3-6, 9, 11-14, 17, 19-22, 25, and 27-30 under 35 U.S.C. § 102(b) as being unpatentable over *Developing a WFT Workflow System* ("*WFT*"). Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that *WFT* fails to disclose all the elements specifically recited in Applicants' claims. For example, *WFT* fails to disclose "the workflow representing an application and comprising a plurality of workflow steps, each workflow step comprising a particular operation of the application" (recited in Applicants' independent Claim 1, as amended).

The Examiner states in the Office Action, "The template software reference teaches tasks, which can be seen a [*sic*] workflow steps (Pages 5-9 and 5-10)." (*Office Action*, page 2, paragraph 5). The Examiner also states, "The Template Software reference teaches a workflow step in the form of a workflow task that performs a certain operation." (*Office Action*, page 3, paragraph 1). Applicants respectfully disagree with the Examiner's characterization of Applicants' Claim 1.

First, *WFT* states, "From a logical perspective, a WFT workflow system is made up of applications; associated with these applications are tasks and the work items that flow throughout the system (see Figure 2-1 on page 2-4)." (*WFT*, page 2-10, paragraph 2). *WFT* states the definition of the term "Application" in Table 2-1 as:

A set of related tasks. The term application is generally used to refer to a set of business-process-related tasks that is analogous to the job functions of a particular kind of employee. For example, one application might encompass the tasks that an inventory clerk performs. See also *Node* and *Task*.

(*WFT*, page 2-10, Table 2-1). Additionally, *WFT* defines the term "Task" as, "Each task in a WFT workflow system is associated with one or more applications. See also *Application*." (*WFT*, page 2-11, Table 2-1). Moreover, *WFT* states tasks are "work activities – for example, *Create Requisition*, *Approve Requisition*, and *Check Inventory*." (*WFT*, page 2-5, paragraph 1). That is, *WFT* discloses a workflow that includes applications, where an application includes business process tasks.

*WFT*'s tasks are clearly not workflow steps as recited in Applicants' claims. A task of *WFT* merely represents a job function of an employee or a work activity, but is not an operation of the application being developed. Therefore, *WFT* fails to disclose, teach, or suggest a "workflow representing an application and comprising a plurality of workflow steps, each workflow step comprising a particular operation of the application," as recited in Applicants' independent Claim 1, as amended. Consequently, Applicants respectfully request that the Examiner withdraw this rejection. For similar reasons, *WFT* fails to disclose the elements specifically recited in Applicants' independent Claims 9, 17, and 25.

Applicants' dependent claims are allowable based on their dependence on the independent claims and further because they recite numerous additional patentable distinctions over the cited reference of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claims over the cited reference of the rejection, and to avoid burdening the record, Applicants have not provided additional detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Applicants respectfully request reconsideration and allowance of independent Claims 1, 9, 17, and 25, and all claims that depend on these claims.

### **Section 103(a) Rejection**

The Examiner rejects Claims 2, 7, 8, 10, 15, 16, 18, 23, 24, 26, and 31-33 under 35 U.S.C. § 103(a) as being unpatentable over *WFT* in light of U.S. Patent No. 5,455,903 to

Jolissaint et al. ("*Jolissaint*"). Applicants respectfully traverse this rejection for the reasons discussed below.

For at least the reasons provided above, *WFT* does not disclose, teach, or suggest the elements specifically recited in Applicants' independent Claims 1, 9, 17, 25, and 33, whether *WFT* is considered alone or in combination with *Jolissaint* or any other reference of record or with knowledge of one skilled in the art at the time of the invention cited by the Examiner. Applicants' dependent claims are allowable based on their dependence on the independent claims and further because they recite numerous additional patentable distinctions over the cited references of the rejection. Because Applicants believe they have amply demonstrated the allowability of the independent claims over the cited references of the rejection, and to avoid burdening the record, Applicants have not provided detailed remarks concerning the dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Applicants respectfully request reconsideration and allowance of independent Claims 1, 9, 17, 25, and 33, and all claims that depend on these claims.

**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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